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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$37,000.00 IN  
U.S. CURRENCY,  
15 Defendant.  
16

2:20-MC-00281-KJM-KJN

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant Hong  
18 Tran (“claimant”), by and through their respective counsel, as follows:

19 1. On or about September 2, 2020, claimant filed a claim in the administrative forfeiture  
20 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
21 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 23, 2020.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim  
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
28 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
That deadline was December 1, 2020.

4. By Stipulation and Order filed November 20, 2020, the parties stipulated to extend to February 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

5. By Stipulation and Order filed January 27, 2021, the parties stipulated to extend to March 3, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May 3, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture.

7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to May 3, 2021.

Dated: 3/2/21

PHILLIP A. TALBERT  
Acting United States Attorney

By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

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1 Dated: 3/2/21

/s/ Geoffrey G. Nathan  
GEOFFREY G. NATHAN  
Attorney for potential claimant  
Hong Tran  
(Signature authorized by email)

7 **IT IS SO ORDERED.**

8 Dated: March 8, 2021

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CHIEF UNITED STATES DISTRICT JUDGE